

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMPSON PRODUCTS, INC.,)
)
Plaintiff,)
)
v.) C.A. No. 05-11810-RGS
)
GLENN THOMPSON, *et al.*,)
)
Defendants.)
)

PLAINTIFF'S MOTION TO FILE CORRECTED AMENDED COMPLAINT

Plaintiff, Thompson Products, Inc. ("TPI"), hereby moves to file the attached corrected Amended Complaint. As grounds for this motion, TPI states that shortly after the Court granted its Motion to file Amended Complaint, it became aware that there were certain typographical errors contained in the Amended Complaint attached to that motion and that the Exhibits were not attached. TPI now proposes to make the following corrections to those errors in its Amended Complaint:

p. 5, paragraph 12 - delete "Verified"

p. 7, paragraph 18 - insert "E" after Ex. at end of paragraph

p. 9, paragraph 20 - change "Ex. E" to "Ex. F" at end of paragraph

p. 10, paragraph 27 - change both dates from "January 1, 2005," to "January 1, 2004"

p. 13, Count II, Wherefore clause - change "2001" to "2003"

p. 16, paragraph 48(b) - insert ", 2004" after January 1

These changes are necessary to fully and accurately describe the claims of TPI against the defendants. No prejudice will result if the corrections are allowed. TPI

attaches hereto for filing and substitution a copy of the corrected Amended Complaint together with a full set of Exhibits.

Respectfully submitted,

THOMPSON PRODUCTS, INC.

By its attorneys,

/s/ Andrew D. Kang

Terence P. McCourt (BBO #555784)

Andrew D. Kang (BBO #637476)

GREENBERG TRAURIG, LLP

One International Place

Boston, MA 02110

Tel: 617.310.6000

Fax: 617.310.6001

and

Sandy T. Tucker

Admitted Pro Hac Vice

Monica McCarroll

Admitted Pro Hac Vice

WILLIAMS MULLEN, A PROFESSIONAL CORPORATION

Post Office Box 1320

Richmond, VA 23218-1320

Tel: 804.783.6418

Fax: 804.783.6507

DATED: January 31, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATE

I, Andrew D. Kang, hereby certify that between January 24 and January 30, 2006, counsel for Plaintiff conferred and corresponded with counsel for Defendants and attempted in good faith to resolve the issues regarding the filing of a corrected Amended Complaint.

/s/ Andrew D. Kang

Andrew D. Kang

CERTIFICATE OF SERVICE

I, Andrew D. Kang, hereby certify that on the 31st day of January, 2006, I served a copy of the foregoing *Motion to File Corrected Amended Complaint* by U.S. Mail to the following counsel of record:

Matthew F. Medeiros, Esq.
LITTLE MEDEIROS KINDER BULMAN & WHITNEY, P.C.
72 Pine Street
Providence, RI 02903

Michael L. Chinitz, Esq.
Lisa A. Tenerowicz, Esq.
ROSE & ASSOCIATES
29 Commonwealth Avenue
Boston, MA 02110

/s/ Andrew D. Kang
Andrew D. Kang